PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Utilimaster
65266 State Road 19
and
21 Ward Street
Wakarusa, Indiana 46573

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7087-00530	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a commercial vehicle assembly plant.

Responsible Official:	Jim Orbik
Source Address:	Plants EU3, EU4, EU5, EU6, EU7, EU8, EU10, EU11, EU12 & 32, EU14, EU16, EU17, EU18: 65266 State Road 19, Wakarusa, Indiana 46573 Plants EU57, EU59, EU60: 21 Ward Street, Wakarusa, Indiana 46573
Mailing Address:	P.O. Box 585, Wakarusa, Indiana 46573
Phone Number:	Dan Murray, 219-862-4561
SIC Code:	3713
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Plant 3, identified as EU3, consisting of:

(1) One (1) final inspection area, with a maximum capacity of six and one half (6.5) truck bodies per hour, using no control, and exhausting to general ventilation GV9-1.

(b) Plant 5, identified as EU5, consisting of:

(1) One (1) painting operation, with a maximum capacity of three and three fourths (3.75) chassis per hour, using dry filters as control, and exhausting to general ventilation, SV8-1 to 2.

(c) Plant 6, identified as EU6, consisting of:

(1) One (1) final inspection operation with an maximum capacity of (7.5) trucks per hour, using no control, and exhausting to general ventilation, GV1-1 to 5.

(d) Plant 8, identified as EU8, consisting of:

(1) One (1) general assembly operation, with a maximum capacity of three (3) chassis per hour, using no control, and exhausting to general ventilation, GV2-1 to 3.

(2) One (1) woodworking operation, with a maximum capacity of two thousand (2000) pounds of wood per hour, using a cyclone, DC2-4, as control, and exhausting to general ventilation, GV2-1.

(e) Plant 10, identified as EU10, consisting of:

(1) One (1) general assembly operation, with a maximum capacity of one and one half (1.5) chassis per hour, using no control, and exhausting to general ventilation GV17-1 to 2.

(f) Plant 11, identified as EU11, consisting of:

(1) One (1) general assembly operation, with a maximum capacity of one and one half (1.5) chassis per hour, using no control, and exhausting to general ventilation, GV3-1 to 2.

(2) One (1) general assembly operation, with a maximum capacity of one (1) chassis per hour, using no control, and exhausting to general ventilation, GV7-1.

(g) Plants 12 & 32, identified as EU18, consisting of:

(1) One (1) service and repair operation, with a maximum capacity of one half (0.5) trucks per hour, using no control, and exhausting to general ventilation, GV18-1,

(2) One (1) painting operation, with a maximum capacity of one half (0.5) trucks per hour, using dry filters as control, and exhausting to general ventilation, GV18-2,

(3) One (1) woodworking operation, with a maximum capacity of two hundred (200) pounds of wood per hour, using a baghouse, DC18-4, as control, and exhausting to general ventilation within the building, and

(4) One (1) cold cleaner degreaser, and exhausting to general ventilation, GV18-1.

(h) Plant 14, identified as EU14, consisting of:

(1) Two (2) surface coating operations, with booths designated as B11-1 through B11-8, one with a maximum capacity of six and one half (6.5) truck bodies per hour and the other with a maximum capacity of five (5) steel racks per hour, using dry filters as control, and exhausting to general ventilation PB11-1 to 7 and SB11-8, respectively.

(i) Plant 16, identified as EU16, consisting of:

(1) One (1) general assembly operation, with a maximum capacity of two and one half (2.5) chassis per hour, using no control, and exhausting to general ventilation GV14-1 to 2, and

(2) One (1) general assembly operation, with a maximum capacity of five and one fourth (5.25) truck bodies and PDV per hour, using no control, and exhausting to general ventilation GV14-1 to 4.

(j) Plant 18, identified as EU18, consisting of:

(1) One (1) general assembly operation, with a maximum capacity of two and one half (2.5) chassis per hour, using no control, and exhausting to general ventilation, GV16-1 to 7,

(2) One (1) undercoating booth, with a maximum capacity of thirteen and one half (13.5) chassis per hour, using dry filters as control, and exhausting to general ventilation, GV16-1 to 7, and

(3) Three (3) storage tanks, EU16-D (diesel fuel), EU16-G (gasoline), EU17-G (gasoline), each with storage capacities less than 10,500 gallons.

(k) Plant 57, identified as EU57, consisting of:

(1) two (2) welding lines, one for steel, with a maximum capacity of 0.85 pounds of wire per unit, and one for aluminum, with a maximum capacity of 0.294 pounds per unit, each producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV57-1 to 3, and

(2) one (1) general assembly operation, producing 3.75 truck bodies per hour, using 2.07 gallons of adhesives per unit, 0.485 gallons of caulks or sealants per unit, using no control, and exhausting to general ventilation, GV57-1 to 3.

(l) Plant 59, identified as EU59, consisting of:

(1) two (2) welding lines, one for steel, with the maximum capacities for steel and aluminum wire included in the EU57 capacities, each producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV59-1, and

(2) one (1) general assembly operation, producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV59-1.

(m) Plant 60, identified as EU60, consisting of:

(1) two (2) welding lines, one for steel, with the maximum capacities for steel and aluminum wire included in the EU57 capacities, each producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV60-1, and

(2) one (1) general assembly operation, producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV60-1.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, degreasing in Plant 8, Plant 10, Plant 16, Plant 18, Plant 15.

(b) Plant 4, identified as EU4, consisting of one (1) welding operation

(c) Plant 7, identified as EU7, consisting of one (1) steel welding operation and one (1) aluminum welding operation

(d) Plant 17, identified as EU17, consisting of one (1) caulking and sealing operation, one (1) metalworking, one (1) woodworking operation, one (1) cleaning solvent degreaser.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(2) If IDEM, OAM,, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

(2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(i) A brief description of the change within the source;

(ii) The date on which the change will occur;

(iii) Any change in emissions; and

(iv) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C **SOURCE OPERATION CONDITIONS**

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) Plant 3, identified as EU3, consisting of:

(1) One (1) final inspection area, with a maximum capacity of six and one half (6.5) truck bodies per hour, using no control, and exhausting to general ventilation GV9-1.

(b) Plant 5, identified as EU5, consisting of:

(1) One (1) painting operation, with a maximum capacity of three and three fourths (3.75) chassis per hour, using dry filters as control, and exhausting to general ventilation, SV8-1 to 2.

(c) Plant 6, identified as EU6, consisting of:

(1) One (1) final inspection operation with an maximum capacity of (7.5) trucks per hour, using no control, and exhausting to general ventilation, GV1-1 to 5.

(2) One (1) woodworking operation, with a maximum capacity of two thousand (2000) pounds of wood per hour, using a cyclone, DC1-7, as control, and exhausting to general ventilation, GV1-1 to 5.

(d) Plant 8, identified as EU8, consisting of:

(1) One (1) general assembly operation, with a maximum capacity of three (3) chassis per hour, using no control, and exhausting to general ventilation, GV2-1 to 3.

(2) One (1) woodworking operation, with a maximum capacity of two thousand (2000) pounds of wood per hour, using a cyclone, DC2-4, as control, and exhausting to general ventilation, GV2-1.

(e) Plant 10, identified as EU10, consisting of:

(1) One (1) general assembly operation, with a maximum capacity of two and one half (2.5) trucks per hour, using no control, and exhausting to general ventilation GV17-1 to 2.

(2) One (1) woodworking operation, with a maximum capacity of two hundred (200) pounds of wood per hour, using a baghouse as control, and exhausting to general ventilation within the building.

(f) Plant 11, identified as EU11, consisting of:

(1) One (1) final inspection area with a maximum capacity of (8.5) trucks per hour, using no control, and exhausting to general ventilation GV7-1.

(g) Plants 12 & 32, identified as EU18, consisting of:

(1) One (1) service and repair operation, with a maximum capacity of one half (0.5) trucks per hour, using no control, and exhausting to general ventilation, GV18-1,

(2) One (1) painting operation, with a maximum capacity of one half (0.5) trucks per hour, using dry filters as control, and exhausting to general ventilation, GV18-2,

(3) One (1) woodworking operation, with a maximum capacity of two hundred (200) pounds of wood per hour, using a baghouse, DC18-4, as control, and exhausting to general ventilation within the building.

Facility Description [326 IAC 2-7-5(15)], continued:

(h) Plant 14, identified as EU14, consisting of:

(1) Two (2) surface coating operations, with booths designated as B11-1 through B11-8, one with a maximum capacity of six and one half (6.5) truck bodies per hour and the other with a maximum capacity of five (5) steel racks per hour, using dry filters as control, and exhausting to general ventilation PB11-1 to 7 and SB11-8, respectively.

(i) Plant 16, identified as EU16, consisting of:

(1) One (1) general assembly operation, with a maximum capacity of two and one half (2.5) chassis per hour, using no control, and exhausting to general ventilation GV14-1 to 2, and

(2) One (1) general assembly operation, with a maximum capacity of five and one fourth (5.25) truck bodies and PDV per hour, using no control, and exhausting to general ventilation GV14-1 to 4.

(j) Plant 18, identified as EU18, consisting of:

(1) One (1) general assembly operation, with a maximum capacity of four (4.0) trucks per hour, using no control, and exhausting to general ventilation, GV16-1 to 7,

(2) One (1) undercoating booth, with a maximum capacity of four (4.0) trucks per hour, using dry filters as control, and exhausting to general ventilation, GV16-1 to 7.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator:

(a) at the State Road 19 site, vehicle body prime paint booth designated as EU-18, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

(b) at the State Road 19 site, the eight (8) paint booths designated as EU-14 (B11-1, B11-2, B11-3, B11-5, B11-6, B11-7, and B11-8), shall be limited to 3.5 pounds of VOC per gallon of coating less water, for air dried coatings.

(c) at the State Road 19 site, the vehicle body non-customized top coat paint booth EU 14, B11-4, shall be limited to 4.3 pounds of VOCs per gallon of coating less water.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) Pursuant to 326 IAC 2-2 and 40 CFR 52.21, these facilities located at the State Road 19 site, Plants EU3, EU6, EU8, EU10, EU12 & 32, EU14, EU16, EU17, EU18, shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable

(b) Pursuant to 326 IAC 2-2 and 40 CFR 52.21, the facilities identified as Plants EU4, EU5, EU7, and EU11 located at the State Road 19 site shall use less than 40 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 40 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.3 Vehicle Weight Limit [326 IAC 8-2-2]

Vehicles coated at the State Road 19 site shall:

(a) be either rated at greater than 8500 pounds per vehicle; or

(b) be manufactured truck bodies for sale separately or on purchased chassis rated at less than 8500 pounds per vehicle, so the requirements of 326 IAC 8-2-2 do not apply.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the surface coating operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The control equipment shall be in operation at all times the surface coating booths are in operation, in order to comply with this limit.

D.1.5 Best Available Control Technology [326 IAC 8-1-6]

Pursuant to Construction Permit PC (20) 1830, 326 IAC 8-1-6 (Best Available Control Technology(BACT)) has been determined to be:

(c) the use of high-solids top coat for the State Road 19 vehicle body top coat paint booth when engaged in customized top coating.

(d) the State Road 19 vehicle body customized top coating shall be limited to less than 35 vehicles per day.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for surface coating operations and any control devices.

Compliance Determination Requirements

D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limits specified in Conditions D.1.1, D.1.2, and D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.10 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, the dry filters for PM control shall be in operation at all times when the surface coating are in operation.

D.1.11 Monitoring

(a) The surface coating booths have applicable compliance monitoring conditions as specified below:

(1) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation

(2) The Permittee shall implement an operator training program with the following requirements:

(A) All operators that perform painting operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of permit issuance. All new operators shall be trained upon hiring.

(B) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be in writing and retained on site. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.

(C) All operators shall be given refresher training annually.

(2) Records shall be maintained of any non-routine maintenance activities performed on the particulate emission control devices which have air flow greater than four thousand cubic feet per minute (4000 cfm).

(3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.12 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The cleanup solvent usage for each month;

(3) The total VOC usage for each month; and

(4) The weight of VOCs emitted for each compliance period.

(b) To document compliance with D.1.5(b), the Permittee shall maintain records of the number of vehicles painted with customized top coating.

(c) To document compliance with Condition D.1.11(a), the Permittee shall maintain the following:

(1) Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.

(2) Records any non-routine maintenance activities performed on the particulate emission control devices which have air flow greater than four thousand cubic feet per minute (4000 cfm).

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Plant 57, identified as EU57, consisting of:

(1) one (1) general assembly operation, producing 3.75 truck bodies per hour, using 2.07 gallons of adhesives per unit, 0.485 gallons of caulks or sealants per unit, using no control, and exhausting to general ventilation, GV57-1 to 3.

(b) Plant 59, identified as EU59, consisting of:

(1) one (1) general assembly operation, producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV59-1.

(b) Plant 60, identified as EU60, consisting of:

(1) one (1) general assembly operation, producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV60-1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the Ward Street site which coat metal shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the surface coating operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limit specified in Conditions D.2.1 and D.2.2, respectively, shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.6 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, the dry filters for PM control shall be in operation and control emissions from the surface coating booths at all times that the surface coating is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.7 Monitoring

(a) The surface coating booths have applicable compliance monitoring conditions as specified below:

(1) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation

(2) The Permittee shall implement an operator training program with the following requirements:

(A) All operators that perform painting operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of permit issuance. All new operators shall be trained upon hiring.

(B) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be in writing and retained on site. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.

(C) All operators shall be given refresher training annually.

(b) Records shall be maintained of any non-routine maintenance activities performed on the particulate emission control devices which have air flow greater than four thousand cubic feet per minute (4000 cfm).

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.2.7(a), the Permittee shall maintain the following:

(1) Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.

(2) Records any non-routine maintenance activities performed on the particulate emission control devices which have air flow greater than four thousand cubic feet per minute (4000 cfm).

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] **Insignificant Activities**

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, degreasing in Plant 8, Plant 10, Plant 16, Plant 18, Plant 15.

(b) Plant 4, identified as EU4, consisting of:
(1) One (1) welding operation

(c) Plant 10, identified as EU10, consisting of one (1) woodworking operation.

(d) Plant 17, identified as EU17, consisting of:
(1) One (1) steel welding operation
(2) One (1) aluminum welding operation

(e) Plant 12 & 32, identified as EU12 and EU32, consisting of:
(1) One (1) woodworking operation, with a maximum capacity of two hundred (200) pounds of wood per hour, using a baghouse, DC18-4, as control, and exhausting to general ventilation within the building.

(f) Plant 57, identified as EU57, consisting of:
(1) two (2) welding lines, one for steel, with a maximum capacity of 0.85 pounds of wire per unit, and one for aluminum, with a maximum capacity of 0.294 pounds per unit, each producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV57-1 to 3.

(f) Plant 59, identified as EU59, consisting of:
(1) two (2) welding lines, one for steel, with the maximum capacities for steel and aluminum wire included in the EU57 capacities, each producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV59-1.

(g) Plant 60, identified as EU60, consisting of:
(1) two (2) welding lines, one for steel, with the maximum capacities for steel and aluminum wire included in the EU57 capacities, each producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV60-1.

(h) Plant 18, identified as EU18, consisting of:
(1) Three (3) storage tanks, EU16-D (diesel fuel), EU16-G (gasoline), EU17-G (gasoline), each with storage capacities less than 10,500 gallons.

(i) Steel and aluminum welding operations in Plants 10, 16, and 18.

(j) One gasoline storage tank outside Plant 11 with storage capacity of less than 10,500 gallons.

(k) One diesel and one gasoline storage tank outside Plant 57 with storage capacity of less than 10,500 gallons each.

(l) Touch-up painting activity in Plant 14, using less than 500 gallons per year, using no controls, and exhausting to the indoors.

(m) Touch-up painting activity in Plant 6, using less than 500 gallons per year, using no controls, and exhausting to the indoors.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) the solvent is agitated; or

(C) the solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Plant 12 & 32, identified as EU12 and EU32, woodworking operations shall be limited to 0.88 pounds per hour based on a maximum capacity of two hundred (200) pounds of wood per hour.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Utilimaster
Source Address: 65266 State Road 19, Wakarusa, Indiana 46573
Mailing Address: P.O. Box 585, Wakarusa, Indiana 46573
Part 70 Permit No.: T039-7087-00530

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Utilimaster
Source Address: 65266 State Road 19, Wakarusa, Indiana 46573
Mailing Address: P.O. Box 585, Wakarusa, Indiana 46573
Part 70 Permit No.: T039-7087-00530

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2

9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C)
- C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_x, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Utilimaster
Source Address: 65266 State Road 19, Wakarusa, Indiana 46573
Mailing Address: P.O. Box 585, Wakarusa, Indiana 46573
Part 70 Permit No.: T039-7087-00530
Facility: Plants EU3, EU6, EU8, EU10, EU12 & 32, EU14, EU16, EU17, EU18
Parameter: VOC
Limit: 250 tons per 12 consecutive months

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Utilimaster
Source Address: 65266 State Road 19, Wakarusa, Indiana 46573
Mailing Address: P.O. Box 585, Wakarusa, Indiana 46573
Part 70 Permit No.: T039-7087-00530
Facility: Plants EU4, EU5, EU7, EU11
Parameter: VOC
Limit: 40 tons per 12 consecutive months

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Utilimaster
Source Address: 65266 State Road 19, Wakarusa, Indiana 46573
Mailing Address: P.O. Box 585, Wakarusa, Indiana 46573
Part 70 Permit No.: T039-7087-00530

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for Part 70 Operating Permit

Source Name:	Utilimaster Corporation
Source Location:	65266 State Road 19 and 21 Ward Street, Wakarusa, Indiana 46573
County:	Elkhart
SIC Code:	3713
Operation Permit No.:	T039-7087-00530
Permit Reviewer:	Holly M. Stockrahm

On October 30, 1999, the Office of Air Management (OAM) had a notice published in the Elkhart Truth Newspaper, in Elkhart, Indiana, stating that Utilimaster Corporation had applied for a Part 70 Operating Permit to operate a commercial vehicle assembly plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 29, 1999, Utilimaster submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

Comment 1:

Section B.11 requires an annual compliance certification report, which addresses the status of the source's compliance with the terms and conditions of this permit. Please provide the necessary report forms to be used in this certification.

Response to Comment 1:

It is the industry's responsibility to provide the certification letter. The industry will be the best source of current compliance status. The permit form titled "Certification" must accompany the Annual Certification or the Annual Certification must state that the certification is based on information and belief fromed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Rule 326 IAC 2-8-3(d) may be used for further reference.

Comment 2:

Section B.16 requires that deviations be reported within 10 calendar days of discovery. 326 IAC 2-7-5(3)(C)(i) clearly requires deviation to be reported only in the monitoring reports required "at least every six (6) months." Subsection (C)(ii) merely expands on the information that must be reported and is not an independent source of authority for the 10-day requirements. Section C.21 of the draft permit requires Utilimaster to submit these reports quarterly. The 10-day provision of Section B.16 (a) is completely unjustified.

Response to Comment 2:

326 IAC 2-7-5(3)(C)(i) sets out the requirement of reporting required monitoring at least every six months. This report must include an identification of all permit deviations. 326 IAC 2-7-5(3)(C)(ii) sets out a separate requirement for reporting those deviations, including all the information required in each deviation report. OAM maintains that reporting deviations every six months is not adequate to ensure that the cause of any reoccurring deviation is corrected in a timely fashion. Ten days has been determined to be a reasonable amount of time to report non-emergency deviations, rather than the shorter reporting times required by the Emergency Provisions. The use of alternate reporting periods is authorized pursuant to 326 IAC 2-7-6(6) (Compliance Requirements) which states "Such other provisions as the commissioner may require", and pursuant to IC 13-14-1-13 which gives the Commissioner authority to establish monitoring and reporting requirements.

In addition, the source should be aware that six months is not the only deviation reporting time period required by 326 IAC 2-7-5(3)(C) (Permit Content). 326 IAC 2-7-5(3)(C)(ii)states "Notwithstanding requirements in this section, the reporting of deviations required by an applicable requirement shall follow the schedule stated in that applicable requirement." 326 IAC 2-7-16(b)(4) (Emergency Provision) requires notification within four (4) daytime business hours after the beginning or discovery of an emergency, and 326 IAC 2-7-16(b)(5) requires the submittal of a faxed or written notice within 2 working days of the time when emission limitations were exceeded due to the emergency.

There has been no change to this condition as a result of this comment.

Comment 3:

Section C.1 purports to apply 326 IAC 6-3-2(c) to processes with process weight rates less than 100 lb/hr. Rule 6-3-2 does not apply to such sources. The process weight table in Rule 6-3-2(c) does not go below 100 lb/hr, and no interpolation is provided for.

Response to Comment 3:

If the facility is subject to 326 IAC 6-3, and its process weight rate is less than 100 lbs./hour, it must meet the allowable emission rate for a process weight rate (pwr) of 100 lbs/hour. The OAM believes this is a logical interpretation of the rule. It also allows individual small facilities that are subject only to 326 IAC 6-3 and general opacity rules to be treated as unlisted insignificant activities. This is now set out in condition C.2.

Comment 4:

Section C.15 requires that a Risk Management Plan should be submitted if a regulated substance is present in more than a threshold amount. This permit addresses actual conditions and should not address “ifs”. Utilimaster is aware of the regulatory requirements and will comply with those requirements should they be applicable. Section C.15 should be deleted.

Response to Comment 4:

OAM disagrees. This provision should be placed in permits where the source may be likely to have present the applicable regulated substance. This comment effects no change to the permit.

Comment 5:

There is absolutely no mention of “Compliance Monitoring Plan” or “Compliance Response Plan” anywhere in the Part 70 regulations, 326 IAC 2-7. (The other authority cited, 326 IAC 1-6 is inapplicable to Part 70 permit sources under 326 IAC 2-7-16(d), except for the requirement for PMPs under Rule 1-6-3.) Utilimaster is aware of the Agency’s jurisdiction for this provision as necessary to contain trigger points for additional monitoring and corrective actions in response to an “out of specification situation.” This standard argument is not relevant to Utilimaster. Compliance with VOC limits does not involve the use of control equipment; it is demonstrated by paperwork. Control of PM from overspray will be measured by the operator training program in Section D.1.11(a)(2). Finally, as discussed elsewhere, there are no PM emissions from any woodworking operation at Utilimaster. Section C.16 is therefore not only illegal but also completely unjustified.

Response to Comment 5:

The U.S. EPA’s CAM rule supplements the existing federal requirements of 40 CFR 70 and corresponding Indiana authority under 326 IAC 2-7. The CAM rule does not apply to this permit (nor does it apply to the majority of Indiana’s initial Part 70 permits) because a completed application was received prior to this rule. The OAM is continuing to implement Indiana’s established approach to compliance monitoring while considering how to address the federal CAM rule through the State rulemaking process. An overview of the established compliance monitoring approach follows.

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comments sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a permittee's PMP might call for the permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the permittee may know from experience, what replacement parts should be kept on hand. The permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be include in every applicable Title V permit pursuant to 326 IAC 2-7-5(13) and for each FESOP permit pursuant to 326 IAC 2-8-4(9). Both of those rules refer back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

(1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),

(2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and

(3) The identification and quantification of the replacement parts for the facility which the permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading (Guidance, page 13). Some of the terminology has changed, as a result of comments from regulated sources, but the requirements in the permit do not conflict with the guidance.

Comment 6:

Section D.1 must be changed to include at the end: "The information in this Section D.1 describing the source is descriptive only, does not constitute enforceable conditions, and does not require supplemental reporting if it changes (in the absence of a modification).

Response to Comment 6:

The descriptions that are listed in the box that prefaces each D Section is based on information that was obtained from the applicant and was used to establish the actual permit conditions that follow. These descriptions are treated the same as those in the A Section and not considered to be directly enforceable. The descriptions of the equipment would only be considered enforceable if explicitly stated in a permit condition. The descriptions should be considered very carefully because, just like the A Section descriptions, changes can affect compliance with existing applicable requirements or trigger new applicable requirements. New requirements may include the need to obtain a revision to this permit prior to affecting the change. The following sentence shall be added to all of the D boxes: (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment 7:

Section D.1.3 requires that the gross weight of vehicles must be greater than 8500 pounds, so Rule 8-2-2 does not apply. Utilimaster custom builds a special body vehicle for the United States Postal Service (USPS) which has a gross weight less than 8500 pounds. However, because this specialty body is built on a chassis already assembled by others, the USPS production facility is not an "automobile or light duty assembly plant" as defined by the USEPA. Utilimaster operates under SIC Code 3713, "establishments primarily engaged in manufacturing truck...bodies...for sale separately or for assembly on purchased chassis." This category is subject to 326 IAC 8-2-9, as opposed to, for instance, SIC Code 3711 which covers establishments "...manufacturing...complete...trucks..." including chassis, which would be covered by Rule 8-2-2. Section D.1.3 needs to be changed to read: "Vehicles coated at the State Road 19 site shall be either rated at greater than 8500 pounds per vehicle; or (ii) be manufactured truck bodies for sale separately or on purchased chassis, so the requirements of 326 IAC 8-2-2 do not apply.

Response to Comment 7:

OAM concurs. Condition D.1.3 shall be revised as follows:

D.1.3 Vehicle Weight Limit [326 IAC 8-2-2]

~~The gross weight of~~ ~~v~~Vehicles coated at the State Road 19 site shall:

(a) be rated at greater than 8500 pounds per vehicle, or

(b) be manufactured truck bodies for sale separately or on purchased chassis rated at less than 8500 pounds per vehicle, so the requirements of 326 IAC 8-2-2 do not apply.

Comment 8:

Sections D.1.4 (a)-(c) seek to limit hourly particulate matter emissions from woodworking machines. First of all, as explained below, these machines do not vent to the ambient air. Second, Rule 6-3-2 cannot legally limit hourly emissions; it can only limit such emissions as a function of hourly process weight rates. Because Utilimaster has no limits on its process weight rates, Sections D.1.4 (a)-(c) are not authorized and must be deleted.

Response to Comment 8:

Regardless of whether the woodworking operations are vented directly to the outside of a building, they are a source of PM emissions. However Condition D.1.4 (a) through (c) should be deleted because Comment 16 states that the processes under (a) and (b) do not exist, and the process under (c) is insignificant and should be moved to Section D.3. The limit on (c) shall be modified to include language that the limit is based on a process weight rate as submitted in the application. Condition D.1.4 been revised as stated under Response to Comment 16.

Comment 9:

Section D.1.6 requires a PMP "for this facility and any control devices." The facility's operating condition is irrelevant to the rate of emissions and there are no control devices, so Section D.1.6 should be deleted.

Response to Comment 9:

OAM disagrees. Previous permits for surface coating operations listed dry filters as control. The proper operation of the spray process and the dry filters on the surface coating operations do effect the rate of emissions, however, the general assembly operations do not have a preventive maintenance that is related to minimizing emissions, so Condition D.1.6 shall be changed as follows:

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~this facility~~ surface coating operations and any control devices.

Comment 10:

Section D.1.7 is duplicative of, and superseded by, Section D.1.8 and should be deleted.

Response to Comment 10:

OAM disagrees. Condition D.1.7 refers to stack testing to determine compliance with emission limits, and D.1.8 refers to analytical testing to determine compliance with VOC content limits. The condition shall not be revised.

Comment 11:

As discussed below, Utilimaster has no PM emissions from woodworking, and therefore the phrase "and baghouses" in Section D.1.10 should be deleted. Sections D.1.11 (a)(2), D.1.11(b), and D.1.12 (d) should also be deleted.

Response to Comment 11:

See Response to Comment 8.

Comment 12:

Compliance with Sections D.1.1 and D.1.2 are both based on record keeping. Accordingly, there is no reason to keep a log of the dates of use as required by Section D.1.12(a)(2), which should be deleted.

Response to Comment 12:

OAM agrees that compliance with Condition D.1.1's VOC content limits do not require a log of the dates of use unless daily weighted averaging is required. Therefore, Condition D.1.12 shall be revised as follows:

D.1.12 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) ~~A log of the dates of use;~~

~~(3)~~ The cleanup solvent usage for each month;

(3~~4~~) The total VOC usage for each month; and

(4~~5~~) The weight of VOCs emitted for each compliance period.

Comment 13:

All the woodworking operations at Utilimaster exhaust to the interior of their respective buildings. None are capable of exhausting to the ambient air, and therefore IDEM has no jurisdiction over these processes. This is why all sections and subsections relating to particulate matter from these operations must be deleted.

Response to Comment 13:

IDEM does not agree that they have no jurisdiction over woodworking operations that exhaust to the interior of buildings. However, Comment 16 establishes that the significant woodworking operations previously noted in Plants 6 and 8 do not exist, and the woodworking processes in Plants 12 & 32 are insignificant. Therefore, all conditions under Section D.1 pertaining to woodworking have been deleted.

Comment 14:

All welding operations described in Sections D.2(a)(1), (b)(1), and (c)(1) are insignificant activities, and should be permitted under Section D.3.

Response to Comment 14:

OAM concurs. The welding operations shall be moved to Section D.3.

Comment 15:

Section D.3.2 seeks to limit hourly particulate matter emissions from welding operations. First of all, these are insignificant activities for which no limits are appropriate. In addition 326 IAC 6-3-2 cannot legally be used to limit hourly emission rates; it can only limit emissions as a function of the hourly process weight rate. Section D.3.2 indirectly limits the process weight rate for these processes and therefore violates Rule 6-3-2. Delete Section D.3.2.

Response to Comment 15:

OAM agrees that the limits are based on process weight rates, and the rates submitted were less than 100 pounds per hour, so Condition C.2 covers the welding processes and Condition D.3.2 for the welding processes shall be deleted.

Comment 16:

The following corrections and additions are Plant specific. Both Sections A.2 and D.1 should be corrected to reflect the following:

1. Plant 6 does not have a woodworking operation. Performs final inspection activities with an maximum capacity of (7.5) trucks per hour, using no control, and exhausting to general ventilation, GV1-1 to 5.

2. Plant 8 does not have a woodworking operation.

3. Plant 10 maximum capacity of operation is (2.5) trucks per hour. There is a woodworking operation that vents to the indoors.

4. Plant 11 has a maximum capacity of (8.5) trucks per hour. Operates a final inspection area with a maximum capacity of (8.5) trucks per hour, using no control, and exhausting to general ventilation GV7-1,

5. Plants 12 & 32 does not have a cold cleaner degreaser unit. Delete Section D.3.1.

6. Plant 18 maximum capacity of (4) trucks per hour. One woodworking operation that vents to the indoors. The (3) storage tanks are insignificant activities and should be moved to Section D.3.

7. Plant 17 contains (1) steel welding operation and (1) aluminum welding operation. These are both insignificant activities and should be permitted under Section D.3.

Response to Comment 16:

1., 2. Plant 6 and Plant 8 woodworking operations have been deleted, Plant 12 & 32 woodworking operation has been moved to the insignificant section. Condition D.1.4 has been changed as follows:

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from~~:~~

(a) ~~the Plant 6 woodworking operations shall be limited to 4.1 pounds per hour,~~

(b) ~~the Plant 8 woodworking operations shall be limited to 4.1 pounds per hour,~~

(c) ~~the Plant 12 & 32 woodworking operations shall be limited to 0.88 pounds per hour,~~

(d) ~~the~~ surface coating operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The control equipment shall be in operation at all times the surface coating booths ~~and the woodworking operations~~ are in operation, in order to comply with this limit.

Monitoring and reporting requirements for the non-existing woodworking operations have been deleted.

Condition D.3.2 Particulate Matter has been added to the insignificant activities section D.3:

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Plant 12 & 32, identified as EU12 and EU32, woodworking operations shall be limited to 0.88 pounds per hour based on a maximum capacity of two hundred (200) pounds of wood per hour.

3. Plant 10 description has changed as follows and Plant 10 woodworking has been added to the insignificant activities:

(a) Plant 10, identified as EU10, consisting of:
(1) One (1) general assembly operation, with a maximum capacity of ~~one~~ two and one half (~~1.5~~2.5) ~~chassis~~ trucks per hour, using no control, and exhausting to general ventilation GV17-1 to 2.

(b) Plant 10, identified as EU10, consisting of one (1) woodworking operation.

4. Plant 11 description has been revised as follows:

Plant 11, identified as EU11, consisting of:
(1) One (1) ~~general assembly operation~~ final inspection area, with a maximum capacity of ~~one~~ eight and one half (~~1.5~~8.5) ~~chassis~~ trucks per hour, using no control, and exhausting to general ventilation, GV~~3-1 to 2~~ 7-1.

~~(2) One (1) general assembly operation, with a maximum capacity of one (1) chassis per per hour, using no control, and exhausting to general ventilation, GV7-1.~~

5. Plant 12 & 32 description has been revised to remove the cold cleaner degreaser unit and but because other plants do have degreaser units Condition D.3.1 shall not be deleted.

6. Plant 18 description in D.1 has been revised as follows:

(In D.1)Plant 18, identified as EU18, consisting of:
(a) One (1) general assembly operation, with a maximum capacity of ~~two and one half (2.5) chassis~~ four (4) trucks per hour, using no control, and exhausting to general ventilation, GV16-1 to 7,

(b) One (1) undercoating booth, with a maximum capacity of ~~thirteen and one half (13.5) chassis~~ four (4) trucks per hour, using dry filters as control, and exhausting to general ventilation, GV16-1 to 7~~, and~~ .

(c) ~~Three (3) storage tanks, EU16-D (diesel fuel), EU16-G (gasoline), EU17-G (gasoline), each with storage capacities less than 10,500 gallons.~~

The TSD should note under Insignificant activity : Plant 18, identified as EU18, consisting of :
(1) Three (3) storage tanks, EU16-D (diesel fuel), EU16-G (gasoline), EU17-G (gasoline), each with storage capacities less than 10,500 gallons.

1. Plant 17 description has been modified as follows:

Plant 17, identified as EU17, consisting of:

(a) ~~One (1) caulking and sealing operation~~ One (1) steel welding operation

(b) ~~One (1) metalworking~~ One (1) aluminum welding operation

~~(c) One (1) woodworking operation~~

~~(d) One (1) cleaning solvent degreaser~~

Comment 17:

Section D.3 Insignificant Activities, the following insignificant activities are in addition to those already listed in Section D.3.

(1) Steel and aluminum welding operations in Plants 10, 16, and 18.

(2) One gasoline storage tank outside Plant 11 with storage capacity of less than 10,500 gallons.

(3) One diesel and one gasoline storage tank outside Plant 57 with storage capacity of less than 10,500 gallons each.

(4) Touch-up painting activity in Plant 14, using less than 500 gallons per year, using no controls, and exhausting to the indoors.

(5) Touch-up painting activity in Plant 6, using less than 500 gallons per year, using no controls, and exhausting to the indoors.

Response to Comment 17:

While the Title V Operating Permit rule requires that applications list all points of emissions (326 IAC 2-7-4 Permit Application) with additional provisions relating to insignificant and trivial activities (326 IAC 2-7-1 Definitions), the rule requires that the permit identify all applicable requirements (326 IAC 2-7-5 Permit Content). The OAM ordinarily includes insignificant activities only as necessary to identify specific applicable requirements. During the development of the model Title V Operating Permit and the subsequent implementation of the program, this approach has been the consensus recommendation of both the regulated community and the OAM. In many cases future additions or deletions of insignificant activities will not require a modification of this permit. It was felt that there would be less confusion if the permit did not give the impression that the rules required every insignificant activity to be listed in the permit. However, if the source requests that all insignificant activities appear in the permit, OAM shall revise the Insignificant Activity section to do so.

Upon further review, IDEM has made the following changes:

1. In order that the booth ID listed under condition D.1.1 more clearly correspond to the emission units listed in D.1, Condition D.1.1(a) and (b) has been changed (in bold) as follows:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator:

(a) at the State Road 19 site, vehicle body prime paint booth **designated as EU-18,** shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

(b) at the State Road 19 site, the eight (8) paint booths designated as **EU-14 (**B11-1, B11-2, B11-3, B11-5, B11-6, B11-7, and B11-8**)**, shall be limited to 3.5 pounds of VOC per gallon of coating less water, for air dried coatings.

(c) at the State Road 19 site, the vehicle body non-customized top coat paint booth **EU 14**, B11-4, shall be limited to 4.3 pounds of VOCs per gallon of coating less water.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Utilimaster
Source Location:	Plants EU3, EU4, EU5, EU6, EU7, EU8, EU10, EU11, EU12 & 32, EU14, EU16, EU17, EU18: 65266 State Road 19, Wakarusa, Indiana 46573 Plants EU57, EU59, EU60: 21 Ward Street, Wakarusa, Indiana 46573
County:	Elkhart
SIC Code:	3713
Operation Permit No.:	T039-7087-00530
Permit Reviewer:	Holly M. Stockrahm

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Utilimaster relating to the operation of a commercial vehicle assembly plant.

Source Definition

This commercial vehicle assembly plant consists of various plants at two (2) addresses:

(a) The Ward Street source is located at 21 Ward Street, Wakarusa, Indiana 46573, (TV application 039-7098-00430); and

(b) The State Road 19 source is located at 65266 State Road 19, Wakarusa, Indiana 46573, (TV application 039-7087-00085).

The operations at these two (2) addresses, which are located 1.2 miles apart, are linked. They have the same SIC codes and are owned by one (1) company, who has requested that they be considered one (1) source. The Ward Street source is a support facility for the State Road 19 source (one hundred percent (100%) of the vehicles assembled at the Ward Street location are sent to the State Road 19 plant for painting, finishing, and distribution). The Ward Street location was constructed and operated without a permit. This Title V review is intended to satisfy the conditions of the Construction Permit Program.

Additionally, in correspondence dated December 29, 1997, Utilimaster stated that the plants, identified as EU4, EU5, EU7, and EU11, (previously identified as EU3, 5, 6, 7, 8) which are currently leased to Monoco Coach, will revert back to Utilimaster in 1999. These operations will be incorporated into the Title V permit and this review is intended to satisfy the conditions of the Construction Permit Program.

Finally, in correspondence dated August 2, 1999, Utilimaster specified the following changes:

New Plant No.	Old Plant No.	New Plant No.	Old Plant No.
1	19	12 & 32	18
2	4	14	11
3	9	15	50
4	6	16	14
5	8	17	15
6	1	18	16
7	5	57	57
8	2	59	59
10	12	60	60
11	3 & 7		

(There was no old plant 4 or 19 listed in the TV application. Old Plant 50 included degreasing which is an insignificant activity.)

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Plant 3, identified as EU3, consisting of:
  (1) One (1) final inspection area, with a maximum capacity of six and one half (6.5) truck bodies per hour, using no control, and exhausting to general ventilation GV9-1. Final inspection operations may include application of sealant, and removal of excess sealant and/or adhesive residue using lacquer thinner.

(b) Plant 5, identified as EU5, consisting of:
  (1) One (1) painting operation, with a maximum capacity of three and three fourths (3.75) chassis per per hour, using dry filters as control, and exhausting to general ventilation, SV8-1 to 2.

(c) Plant 6, identified as EU6, consisting of:
  (1) One (1) general assembly operation, with a maximum capacity of two (2) chassis per hour, using no control, and exhausting to general ventilation, GV1-1 to 5,

  (2) Surface coating operation, with a maximum capacity of two (2) chassis per hour, using dry filters as control, and exhausting to general ventilation, GV1-1 to 5, and

  (3) One (1) woodworking operation, with a maximum capacity of two thousand (2000) pounds of wood per hour, using a cyclone, DC1-7, as control, and exhausting to general ventilation, GV1-1 to 5.

(d) Plant 8, identified as EU8, consisting of:
  (1) One (1) general assembly operation, with a maximum capacity of three (3) chassis per hour, using no control, and exhausting to general ventilation, GV2-1 to 3.

  (2) One (1) woodworking operation, with a maximum capacity of two thousand (2000) pounds of wood per hour, using a cyclone, DC2-4, as control, and exhausting to general ventilation, GV2-1.

(e) Plant 10, identified as EU10, consisting of:
  (1) One (1) general assembly operation, with a maximum capacity of one and one half (1.5) chassis per hour, using no control, and exhausting to general ventilation GV17-1 to 2.

(f) Plant 11, identified as EU11, consisting of:
  (1) One (1) general assembly operation, with a maximum capacity of one and one half (1.5) chassis per hour, using no control, and exhausting to general ventilation, GV3-1 to 2.

  (2) One (1) general assembly operation, with a maximum capacity of one (1) chassis per per hour, using no control, and exhausting to general ventilation, GV7-1.

(g) Plants 12 & 32, identified as EU18, consisting of:
  (1) One (1) service and repair operation, with a maximum capacity of one half (0.5) trucks per hour, using no control, and exhausting to general ventilation, GV18-1,

  (2) One (1) painting operation, with a maximum capacity of one half (0.5) trucks per hour, using dry filters as control, exhausting to general ventilation, GV18-2,

(3) One (1) woodworking operation, with a maximum capacity of two hundred (200) pounds of wood per hour, using a baghouse, DC18-4, as control, and exhausting to general ventilation within the building, and

(4) One (1) cold cleaner degreaser, exhausting to general ventilation, GV18-1.

(h) Plant 14, identified as EU14, consisting of:

(1) Two (2) surface coating operations, with booths designated as B11-1 through B11-8, one with a maximum capacity of six and one half (6.5) truck bodies per hour and the other with a maximum capacity of five (5) steel racks per hour, using dry filters as control, and exhausting to general ventilation PB11-1 to 7 and SB11-8, respectively.

(i) Plant 16, identified as EU16, consisting of:

(1) One (1) general assembly operation, with a maximum capacity of two and one half (2.5) chassis per hour, using no control, and exhausting to general ventilation GV14-1 to 2, and

(2) One (1) general assembly operation, with a maximum capacity of five and one fourth (5.25) truck bodies and parcel delivery vehicles (PDV) per hour, using no control, and exhausting to general ventilation GV14-1 to 4.

(j) Plant 18, identified as EU18, consisting of:

(1) One (1) general assembly operation, with a maximum capacity of two and one half (2.5) chassis per hour, using no control, and exhausting to general ventilation, GV16-1 to 7,

(2) One (1) undercoating booth, with a maximum capacity of thirteen and one half (13.5) chassis per hour, using dry filters as control, and exhausting to general ventilation, GV16-1 to 7, and

(3) Three (3) storage tanks, EU16-D (diesel fuel), EU16-G (gasoline), EU17-G (gasoline), each with storage capacities less than 10,500 gallons.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

(a) Plant 57, identified as EU57, consisting of:

(1) two (2) welding lines, one for steel, with a maximum capacity of 0.85 pounds of wire per unit, and one for aluminum, with a maximum capacity of 0.294 pounds per unit, each producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV57-1 to 3, and

(2) one (1) general assembly operation, producing 3.75 truck bodies per hour, using 2.07 gallons of adhesives per unit, 0.485 gallons of caulks or sealants per unit, using no control, and exhausting to general ventilation, GV57-1 to 3.

(b) Plant 59, identified as EU59, consisting of:

(1) two (2) welding lines, one for steel, with the maximum capacities for steel and aluminum wire included in the EU57 capacities, each producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV59-1, and

(2) one (1) general assembly operation, producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV59-1.

(c) Plant 60, identified as EU60, consisting of:

(1) two (2) welding lines, one for steel, with the maximum capacities for steel and aluminum wire included in the EU57 capacities, each producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV60-1, and

(2) one (1) general assembly operation, producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV60-1.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.(Six (6) natural gas fired boilers, each with a capacity of 6.5 million Btu/hr)

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, degreasing in Plant 8, Plant 10, Plant 16, Plant 18, Plant 15.

(c) Plant 7, identified as EU7, consisting of:
(1) One (1) steel welding operation, with a maximum capacity of three and three fourths (3.75) steel units per hour, using no control, and exhausting to general ventilation GV5-1,

(2) One (1) aluminum welding operation, with a maximum capacity of three and three fourths (3.75) aluminum units per hour, using no control, and exhausting to general ventilation GV5-1, and

(3) One (1) general assembly operation, with a maximum capacity of three and three fourths (3.75) truck bodies per hour, using no control, and exhausting to general ventilation, GV5-1.

(d) Plant 4, identified as EU4, consisting of:
(1) One (1) welding operation, with a maximum capacity of three and three fourths (3.75) chassis per per hour, using no control, and exhausting to general ventilation, GV6-1 to 4.

(e) Plant 17, identified as EU17, consisting of:
(1) One (1) caulking and sealing operation
(2) One (1) metalworking
(3) One (1) woodworking operation
(4) One (1) cleaning solvent degreaser

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Registration, (no number), issued on March 17, 1981;
(b) Registration, (no number), issued on May 31, 1983;
(c) Registration, (no number), issued on January 16, 1989;
(d) Registration, (no number), issued on May 21, 1990;
(e) PC (20) 1830, issued on November 26, 1990;
(f) Registration, (no number), issued on January 24, 1991; and
(g) CP 139-3718, ID 039-00085, issued on September 20, 1994.

The source has requested that specific VOC limits on Plant 11 operations at the State Road 19 source be removed as these limits were based on the fact that Elkhart County was non-attainment for ozone at the time. Elkhart has been redesignated as attainment, therefore, OAM concurs. There will be no increase in overall emissions. At Utilimaster Corporation's request, the State Road 19 previously permitted source PTE shall be limited to less than 250 tons of VOC per year. The

Ward Street site, which was constructed, but never permitted, have the potential to emit 109 tons of VOC per year. The addition to the State Road 19 site of Plants 4, 5, 7, and 11, which were previously occupied by Monaco Coach shall be limited to less than 40 tons of VOC per year to avoid PSD applicability.

The following conditions have been deleted:

(a) Operation Condition No. 6, from Construction Permit, PC (20) 1830, issued on November 26, 1990:
That the surface coating organic solvent concentrations and gallons applied in all four paint booths (designated as B11-1, B11-2, B11-3, and the B-11-9) at Plant 11 and all clean-up solvent used, less the amount recovered and shipped off-site in closed containers, shall be limited such that the total amount of organic solvent delivered to the applicators shall not exceed 5.36 tons per month (64.32 tons per year, which was an increase of less than 40 tons per year from the existing source). Therefore, the State and Federal rules for Emission Offset will not apply.

(b) Operation Condition No. 5, from Construction Permit, CP0039-3718, issued on September 20, 1994:
That the VOC input to the six (6) paint booths designated as B11-4, B11-5, B11-6, B11-7, PB11-8, and PB11-9 shall be limited to 39 tons per year, based on a twelve month average rolled on a monthly basis. During the first twelve (12) months of operation, VOC usage shall be limited such that the total VOC used divided by the months of operation shall not exceed 3.25 tons per month. Therefore, the requirements of 326 IAC 2-3 shall not apply. Any change or modification which may increase the actual VOC emissions to 40 tons per year from the equipment and operations covered on this permit shall obtain a major permit pursuant to 326 IAC 2-3 before such a change may occur.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment.*

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 `permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An administratively complete Part 70 permit application for the purposes of this review was received on November 4, 1996. A notice of completeness letter was mailed to the source on November 20, 1996. Additional information was received on November 18, 1996, December 29, 1997, July 20, 1998, and July 27, 1999.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	17.958
PM-10	67.929
SO_2	0
VOC	1061.095
CO	0
NO_x	0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
single	greater than 10
combined	greater than 25
TOTAL	greater than 25

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.002
PM-10	0.337
SO_2	0
VOC	94.741
CO	0
NO_x	0
HAPs	greater than 25

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
State Road 19, Plants EU3, EU6, EU8, EU10, EU12 & 32, EU14, EU16, EU17, EU18				<250			
State Road 19, EU4, EU5, EU7, and EU11				<40			

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment or unclassifiable
SO_2	attainment or unclassifiable
NO_2	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source. The degreasing performed at this source does not use chlorinated solvents, so 40 CFR Part 63, Subpart T, does not apply.

State Rule Applicability - Entire Source

326 IAC 2-2 and 40 CFR 52.21 (PSD Minor Limits)

This source is a major source with the following emission limitations:

(a) Pursuant to 326 IAC 2-2 and 40 CFR 52.21, these facilities located at the State Road 19 site, Plants EU3, EU6, EU8, EU10, EU12 & 32, EU14, EU16, EU17, EU18, shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

(b) Pursuant to 326 IAC 2-2 and 40 CFR 52.21, the facilities identified as Plants EU4, EU5, EU7, and EU11 located at the State Road 19 site shall use less than 40 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 40 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2 (8) (Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from:

(a) the Plant 6 woodworking operations shall be limited to 4.1 pounds per hour based on a maximum process weight rate of one (1) ton of wood per hour,

(b) the Plant 8 woodworking operations shall be limited to 4.1 pounds per hour based on a maximum process weight rate of one (1) ton of wood per hour,

(c) the Plant 12 & 32 woodworking operations shall be limited to 0.88 pounds per hour based on a maximum process weight rate of two hundred (200) pounds of wood per hour,

(d) the Plant 7 welding operations shall be limited to 0.551 pounds per hour based on a maximum process weight rate of less than one hundred (100) pounds of wood per hour,

(e) the Plant 4 welding operations shall be limited to 0.551 pounds per hour based on a maximum process weight rate of less than one hundred (100) pounds of wood per hour,

(f) the Plant 17 welding operations shall be limited to 0.551 pounds per hour based on a maximum process weight rate of less than one hundred (100) pounds of wood per hour,

(g) the surface coating operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The control equipment shall be in operation at all times the surface coating booths and the woodworking operations are in operation, in order to comply with this limit.

326 IAC 8-1-6 (Best Available Control Technology)

Pursuant to Construction Permit PC (20) 1830, 326 IAC 8-1-6 (Best Available Control Technology(BACT)) has been determined to be:

(a) the use of high-solids top coat for the State Road 19 vehicle body top coat paint booth when engaged in customized top coating.

(b) the State Road 19 vehicle body customized top coating shall be limited to less than 35 vehicles per day.

326 IAC 8-2-2 (Vehicle Weight Limit)

The gross weight of vehicles coated at the State Road 19 site shall be rated at greater than 8500 pounds per vehicle, so the requirements of 326 IAC 8-2-2 do not apply.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator:

(a) at the State Road 19 site, vehicle body prime paint booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

(b) at the State Road 19 site, the eight (8) paint booths designated as B11-1, B11-2, B11-3, B11-5, B11-6, B11-7, and B11-8, shall be limited to 3.5 pounds of VOC per gallon of coating less water, for air dried coatings.

(c) at the State Road 19 site, the vehicle body non-customized top coat paint booth, B11-4, shall be limited to 4.3 pounds of VOCs per gallon of coating less water.

(d) at the Ward Street site, all coatings applied to metal shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

(a) Pursuant to 326 IAC 8-3-5(a), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) the solvent is agitated; or

(C) the solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The surface coating booths have applicable compliance monitoring conditions as specified below:

(1) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation.

(2) The Permittee shall implement an operator training program with the following requirements:

(A) All operators that perform painting operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of permit issuance. All new operators shall be trained upon hiring.

(B) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be in writing and retained on site. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.

(C) All operators shall be given refresher training annually.

(3) Records shall be maintained of any non-routine maintenance activities performed on the particulate emission control devices which have air flow greater than four thousand cubic feet per minute (4000 cfm).

(4) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

(b) The woodworking operations have applicable compliance monitoring conditions as specified below:

(1) An inspection of the woodworking cyclone stack exhausts (DC1-7, DC2-4, DC18-4) shall be performed every calendar quarter while the process being controlled is in operation. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere, and every three (3) months, thereafter. Inspections are optional when venting to the indoors.

(2) In the event that cyclone failure has been observed:

(A) Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

(B) Within eight (8) hours of the determination of the failure, response steps according to the timetable described in the Compliance Response Plan (CRP) shall be initiated. For any failure with corresponding response steps and timetable not described in the CRP, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

(C) The permittee shall maintain records of the results of the inspections if required and the dates the vents are redirected.

These monitoring conditions are necessary because the cyclone for the woodworking processes must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

Conclusion

The operation of this commercial vehicle assembly plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T039-7087-00530.**